

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications  
and Energy on its own Motion to Implement the  
Requirements of the Federal Communications  
Commission's Triennial Review Order Regarding  
Switching for Mass Market Customers

D.T.E. 03-60 – Track B

**PUBLIC VERSION OF AT&T's SIXTH SET OF  
INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS**

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. AT&T requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket on October 17, 2003 and November 24, 2003.

**INSTRUCTIONS**

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
5. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
6. Unless otherwise stated, information requests refer to the state of Massachusetts.

## INFORMATION REQUESTS

**ATT-VZ-189** Please explain the assumptions and calculations that underlie the direct support component of labor rates used in Verizon's NRCM resulting in an <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour cost for the direct support of employees in JFC 2300 that work in the National Market Center (NMC) but only a <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour cost for direct support of employees in JFC 4750 that work in the Regional CLEC Coordination Center (RCCC) and a <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour cost for direct support of employees in JFC 4350 that work in the Central Office Wiring/CO Frame organization.

**ATT-VZ-190** Please explain the assumptions and calculations that underlie the direct miscellaneous component of labor rates used in Verizon's NRCM resulting in a <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour direct miscellaneous cost for employees in JFC 4000 Basic Assignment but only a <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour direct miscellaneous cost for employees in JFC 4150 Network Installation and Maintenance and a <<**PROPRIETARY XXXXXX PROPRIETARY**>> per hour direct miscellaneous cost for employees in JFC 4350 Distributing Frame Work.

AT&T Communications of New England, Inc.,  
By its attorneys,

---

Kenneth W. Salinger  
Ruth T. Dowling  
Laurie S. Gill  
John T. Bennett  
Michael S. Rabieh  
PALMER & DODGE LLP  
111 Huntington Avenue  
Boston, MA 02199  
617.239.0100  
617.227.4420 (fax)  
[Lgill@palmerdodge.com](mailto:Lgill@palmerdodge.com)

Jay E. Gruber  
Harry M. Davidow  
AT&T Communications of  
New England, Inc.  
99 Bedford Street, 4<sup>th</sup> Floor  
Boston, MA 02111  
617.574.3149  
[jegruber@lga.att.com](mailto:jegruber@lga.att.com)

January 23, 2004